# RI COALITION FOR THE ENVIRONMENT

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October 1, 2001

### VIA FACSIMILE

Carol Hanlon
Yucca Mountain Site Characterization Office (M/S #025)
P.O. Box 30307
North Las Vegas, NV 89036-0307

Re: Yucca Mountain Comments

#### Dear Ms. Hanlon:

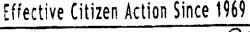
The Missouri Coalition for the Environment ("Coalition") submits the following comments on the Secretary of Energy's consideration of Yucca Mountain as a site for the storage of nuclear waste. The Coalition is a St. Louis based conservation organization with over 1,000 members that focuses on protecting Missouri's environment.

## Concerns About The Shipment of Nuclear Waste

The Coalition urges the Secretary of Energy to fully consider the specific risks associated with shipping large quantities of nuclear waste across the country to Yucca Mountain before making his recommendation. The public should be informed of the intended routes and probable quantities of waste along each route. The Yucca Mountain project is inextricably linked with the transport of these wastes from other areas of the country and all of these environmental and health impacts must be considered before the project proceeds.

St. Louis is located in the nation's heartland at the intersection of several routes of the Interstate Highway System and national railway system. In addition, seventy-six of the nation's one-hundred and three operating nuclear reactors are located east of the Mississippi River. The St. Louis region—home to nearly 2.5 million people—will undoubtedly be traversed by many of the shipments of nuclear waste that would be sent to the Yucca Mountain site and the major travel corridors pass through many heavily populated areas.

Transportation accidents are a frequent occurrence on the nation's highways and railways. Some of these accidents result in extreme damage to the vehicles involved from both the force of the impact or fires or chemical spills. For example, this past July a sixty-car freight train hauling hazardous chemicals derailed in a 1.5 mile tunnel near



Baltimore. The resulting fire burned out of control for more than four days and reached a temperature of 1650 degrees Fahrenheit. (It should be noted here that Nuclear Regulatory Commission standards only require that irradiated-fuel shipping casks withstand temperatures of 1475 degrees for one-half hour). Another train accident occurred in St. Louis County this May along a heavily populated route that resulted in thirteen coal cars dumping their contents near several homes. The presence of hazardous or irradiated waste on this train could have resulted in disaster.

Recent events have also heightened the concern about terrorist attacks inside the United States. The Secretary of Energy should give detailed consideration to the threat of such attacks along the routes to Yucca Mountain and the possible consequences for nearby communities.

## Concerns About The Suitability of Yucca Mountain

During the years that Yucca Mountain has been under consideration by the Department of Energy, additional information has been discovered about its geologic characteristics. Much of this information indicates that it is unsuitable for a permanent nuclear waste disposal site. Seismic activity in the area makes it likely that radioactive materials would eventually contaminate the groundwater and escape into the surrounding environment. Evidence also indicates that water travels through the rock and soil of the area much more quickly than previously anticipated. This could lead to the erosion of storage containers and leakage of wastes into the environment. Finally, there are serious concerns about volcanic activity in the area that could produce catastrophic consequences.

#### Conclusion

The complications outlined above lead to the conclusion that the Yucca Mountain project poses too many dangers to the public's health and safety to move forward as currently proposed. We urge the Secretary of Energy to recommend that this dangerous and costly project be abandoned.

The Coalition also encourages the United States government to give detailed consideration to the future viability of nuclear energy. The Yucca Mountain project has served to remind us that the problem of nuclear waste disposal has yet to be solved. In fact, there may be no acceptable solution to the problem. It is time for the United States and other countries to stop generating nuclear waste unless and until it can be safely disposed of.

Very truly yours,

Bea Covington

**Executive Director** 

Edward J. Heisel Senior Law & Policy Coordinator